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Attorneys for Defendant
Memorial Sloan-Kettering Cancer Center

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HELEN S. KAHANER, for herself and all others
similarly situated,

Plaintiff,

VS.

MEMORIAL SLOAN-KETTERING CANCER
CENTER,

Defendant.


**NOTICE OF MOTION TO
DISMISS THE COMPLAINT**

Case No. 07 Civ. 9626 (NRB/KNF)

PLEASE TAKE NOTICE, that upon the annexed Declaration of Roger Parker, dated February 29, 2008; the exhibits annexed thereto; the Declaration of Leonard M. Rosenberg, Esq., dated February 29, 2008; the exhibits annexed thereto; and the supporting Memorandum of Law, dated February 29, 2008; and upon all the pleadings and proceedings heretofore had herein, the Defendant Memorial Sloan-Kettering Cancer Center will move before this Court at the United States Courthouse, 500 Pearl Street, New York, New York, 10007, on the 14th day of April, 2008 at 9:30 a.m., or as soon thereafter as counsel may be heard, for an order dismissing Plaintiff's Complaint with prejudice, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure; and such other and further relief as this Court may deem just and proper.

Dated: Great Neck, New York
February 29, 2008

GARFUNKEL, WILD & TRAVIS, P.C.
Attorneys for Defendant
Memorial Sloan-Kettering Cancer Center

By: 

Leonard M. Rosenberg (LR 6910)

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